

3.1 INTRODUCTION

Illicit connections are defined here as specific pathways for illicit discharges, even though a discharge may be infrequent or intermittent. The goal of the illicit connection elimination program is to eliminate these connections to the maximum extent practicable. Each Permittee's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as shown in Table 3-1.

Table 3-1 Permit Requirements - Illicit Connection Elimination		
Report Section	Requirement	Permit Section
3.2.1	Implement storm drain inspection procedures.	4.G.2.a.1
3.2.2	Implement illicit connection investigation procedures	4.G.2.b.1
3.2.2	Implement illicit connection termination procedures.	4.G.2.b.2
3.2.4	Implement enforcement procedures to eliminate illicit connections.	4.G.2.b.2
3.2.5	Implement a record keeping system to document illicit connections.	4.G.1.b

The baseline objectives of the program are:

- A screening of the storm drain system will be conducted by maintenance personnel for illicit connections following the schedule presented in Section 3.2.1.
- A connection to the storm drain system, that is suspected or observed to be the source of an illicit discharge, will be investigated to determine the source and nature of the discharge. The connection may be discovered while investigating a suspected illicit discharge, or detected by field staff during the screening of the storm drain system or during the course of their normal daily activities.
- Once the illicit discharge has been investigated as described in Section 2, one of the following actions must occur:
 - If the discharge is determined to consist only of exempted non-stormwater, the connection will be allowed to remain and will no longer be considered an illicit connection. Permittees may elect to issue a permit for the connection or allow the connection to remain if information on the connection is recorded as described in the model program; or
 - The discharge will be permitted through a separate NPDES permit; or
 - The connection will be terminated through voluntary action or enforcement proceedings.

This strategy is summarized in Figure 3-1.

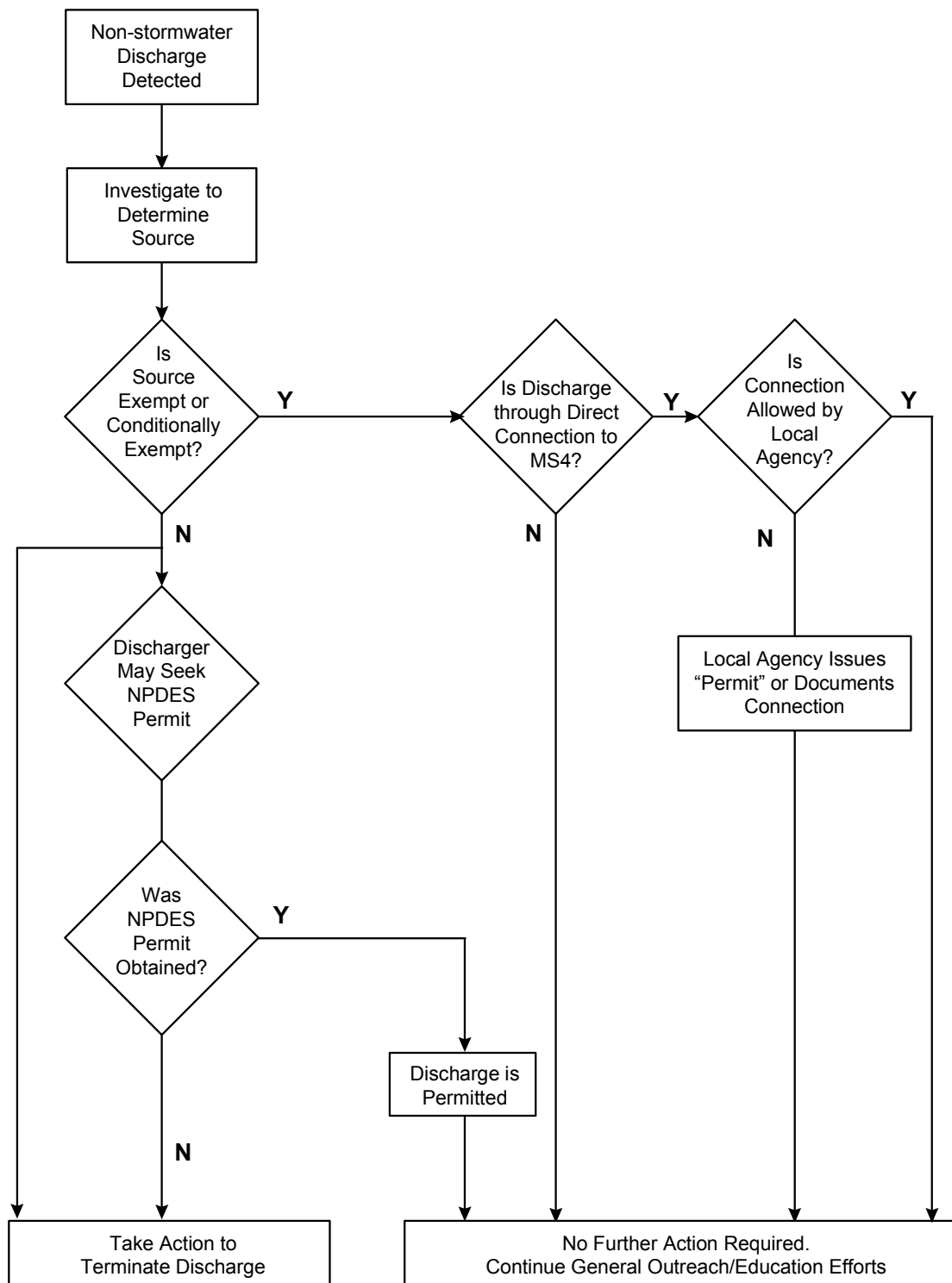


Figure 3-1
Illicit Discharge/Illicit Connection Elimination Strategy

3.2 PROGRAM IMPLEMENTATION ELEMENTS

3.2.1 Storm Drain System Inspection

Standardized procedures for storm drain inspection for illicit connections will be implemented. The procedures include:

- Inspect open channels no later than February 3, 2003.
- Inspect underground storm drains in priority areas no later than February 1, 2005.
- Inspect underground storm drains with a diameter of 36 inches or greater no later than December 12, 2006.

3.2.2 Illicit Connection Investigation

Standardized procedures for identification of illicit connections will be implemented. The procedures include:

- During routine site inspections (e.g., Industrial Waste, Hazardous Materials, construction), or storm drain system inspection activities as outlined in Section 3.2.1, look for connections that exhibit evidence of suspected illicit discharges.
- If evidence of an illicit discharge is detected, as discussed in Section 2, and the source does not appear to be evident or above ground, investigate to determine if the discharge is being conveyed through an illicit connection. Methods to locate illicit connections include:
 - Document research (e.g., storm drain system maps, prior investigation documents, permit files)
 - Physical inspections of catch basins, manholes, and lines large enough for safe entry
 - Dye test
 - Smoke tests
 - T.V. inspections
- Permittees will initiate an investigation within 21 days from the discovery or upon receiving a report of a suspected illicit connection.

Guidance for the selection and use of appropriate field screening techniques is included in Appendix J.

3.2.3 Illicit Connection Termination

Once a suspected illicit connection has been located and the nature and source of the discharge has been identified, follow-up action will be initiated in one of the following ways:

- If the discharge is determined to be exempt or conditionally exempt, the connection may be left intact. The connection must either be permitted or a record of the connection investigation will be kept on file as described in Section 3.2.5.
- If the discharger applies for and receives a separate NPDES permit, the connection may be left intact.
- If the connection is the source of continuous or intermittent illicit discharges, either the discharge must be terminated as discussed in Section 2 and a record of the connection kept on file, or the connection must be terminated, either voluntarily or through additional enforcement.

Upon confirmation of the illicit nature of a storm drain connection, the illicit connection will be terminated within 180 days.

Appropriate staff, such as inspectors and field crews, should be educated about how to conduct illicit connection investigations. Guidance for conducting an educational program is included in Appendix E.

3.2.4 Standardized Enforcement Procedures

Enforcement procedures will be implemented when terminating illicit connections. Enforcement procedures will be consistent with the Permittee's legal authority. While legal authority for Permittees varies, most enforcement processes follow a common sequence. Typically they include:

- Verbal or written warnings for minor violations
- Formal notice of violation or non-compliance with specific actions and time frames for compliance
- Cease and desist or similar order to comply
- Specific remedies such as civil penalties (e.g., infraction), non-voluntary termination with cost recovery, or referral for criminal penalties or further legal action

Enforcement activity will begin at the appropriate level as determined by the Permittee's authorized representative. It need not necessarily be imposed sequentially. For incidents that are more severe or threatening at the outset, enforcement will start at an increased level. Enforcement steps will be accelerated if there is evidence of a clear failure to act, or an increasing severity of the discharge. An example of enforcement strategy and guidance is included in Appendix G.

3.2.5 Record Keeping and Documentation

A standardized record keeping system will be implemented to document illicit connections detected within the local jurisdiction. The standards elements are:

- Record the following minimum information on all suspected illicit connections:
 - Type of connection
 - Location
 - Evidence of illicit discharge
 - Action taken
 - Date incident was closed
- Forward the information to a designated individual/department.

A form that can be used to collect this information, *Illicit Discharge/Connection Reporting and Response*, is included in Appendix H.

3.2.6 Mapping Illicit Connections

The 2001 NPDES permit requires all permittees to map all illicit connections within their local jurisdiction. In addition, as presented in Section 3.2.5, a standardized record keeping system (most likely in the form of a tabular database) will be implemented. A system is needed to facilitate analysis and identify priority areas of illicit discharges. A Geographic Information System (GIS) is the ideal tool to spatially integrate and analyze the required data.

A standardized mapping system using GIS will be implemented to map all illicit discharges within the local jurisdiction.